

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	NOTICE OF DISCOVERY
	:	MOTIONS FILED ON BEHALF
	:	OF ALL DEFENDANTS
ROBERT COPLAN,	:	
MARTIN NISSENBAUM,	:	(S1) 07 Cr. 453 (SHS)
RICHARD SHAPIRO,	:	
BRIAN VAUGHN,	:	
DAVID L. SMITH, and	:	
CHARLES BOLTON,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that upon the affidavit of John J. Tighe, Jr., sworn to May 5, 2008, which was submitted in support of Defendant Richard Shapiro's Pre-Trial Motions, together with the exhibits thereto; and all other papers and proceedings herein, defendants Robert Coplan, Martin Nissenbaum, Richard Shapiro, Brian Vaughn and Charles Bolton will move this Court, before the Hon. Sidney H. Stein, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, at such date and time as the Court may direct, for the following relief:

1. For an Order, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, directing the government to provide a bill of particulars;
2. For an Order, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, directing the government to specify, no later than December 24, 2008, the documents it intends to use in its case-in-chief at trial;
3. For an Order directing the government to produce immediately all information in its possession required to be produced pursuant to Brady v. Maryland, 373 U.S. 83 (1963), and its progeny;

4. For an Order directing the government to provide, no later than December 1, 2008, all information which tends to impeach the credibility of the government's witnesses, the production of which is required pursuant to Giglio v. United States, 405 U.S. 150 (1972), and its progeny;

5. For an Order directing the government to produce, no later than December 24, 2008, all materials it is required to produce pursuant to the Jencks Act, 18 U.S.C. § 3500;

6. For an Order directing the government to produce a list of trial witnesses no later than December 24, 2008;

7. For an Order directing the government to provide notice, no later than February 1, 2009, of its intention to offer evidence of "similar acts" or other evidence pursuant to Rule 404(b), Federal Rules of Evidence, and if so, setting forth the date, place and describe the nature of each such "other crime" evidence; and

8. For such other and further relief as the Court may deem just and proper.

Dated: May 5, 2008  
New York, New York

MORVILLO, ABRAMOWITZ, GRAND,  
IASON, ANELLO & BOHRER, P.C.

/s/ John J. Tigue, Jr.

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